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STATE OF IOWA DEPARTMENT OF

Health <sup>AND</sup> Human

SERVICES

# Telehealth

November 7, 2022

# Proposed Telehealth Code Sets

- The Medical Director for Medicaid's Quality Improvement Organization and other clinical team members, have considered each code set based on whether the same or enhanced level of care could be provided virtually, and/or likely increase healthcare access for Medicaid members.
- The proposed code set was distributed to the Medicaid Clinical Advisory Committee and the Medical Assistance Advisory Council for feedback.
- Articles and presentations from experts have been considered.
- Feedback from the Managed Care Organizations (MCOs) and other stakeholders has been considered.
- Telehealth code sets available for Iowa Medicaid and the Centers for Medicare and Medicaid (CMS) prior to the pandemic and those codes that were added during the public health emergency have been reviewed.
- Comparison to Wellmark code sets were made, few differences were noted.

# Proposed Telehealth Code Sets

- Iowa Medicaid staff have reviewed the code sets that have been billed via Telehealth during the public health emergency, each code is being considered based on:
  - The ability to provide the same level of care virtually,
  - Did the Telehealth service increase quality of care for the member?
  - Did the delivery of Telehealth increase access to members?
- The code set recommendations for coverage and non-coverage presented today are DRAFT.
- It is expected that post-pandemic billing for Telehealth will normalize.
- Medicaid will continue to monitor data and adapt to members' Telehealth needs as new information and requests from the provider network are received.

# Telehealth Provider Reminders

- As mentioned, the proposed Telehealth code sets are DRAFT, we expect changes, and we will update lists on the website based on ongoing feedback.
- Proposed Telehealth code sets can be found at these links:
  - [Telehealth Issues and Decisions](#)
  - [Telehealth Recommendations, Coverage](#)
  - [Telehealth Recommendations, Non-Coverage](#)
- Federal partners (CMS) have not yet finalized the Medicare Telehealth code set, an updated list was released 11/2/22, staff are in the process of reviewing the updated lists.
- Use of Telehealth is always the patient choice.
- For every Telehealth visit the patient must be notified that the visit is Telehealth and will be billed. Standard verbal language for each visit is encouraged.

# Proposed Telehealth Code Sets-Recommend Non-Coverage

- 232 Procedure Codes are recommended to be continued via Telehealth post public health emergency.
- 91 Procedure Codes are being recommended to NOT continue via Telehealth post public health emergency.
- Rationale for non-coverage recommendations:
  - Prior to the public health emergency, it was not available as a Telehealth service. There have been *no provider requests for continuation* via Telehealth.
  - Prior to the public health emergency, it was not available as a Telehealth service. Additionally, the service appears to either require face-to-face or direct patient contact from a qualified healthcare professional. There have been *no provider requests for continuation* via Telehealth.
  - Prior to the public health emergency, it was not available as a Telehealth service. Due to the complexity of the service, it would be too difficult to perform or cannot be performed via Telehealth. There have been *no provider requests for continuation* via Telehealth.
  - Group therapies.
  - Requires a physical exam or actual patient contact.

# Proposed Telehealth Code Sets-Recommend Coverage

- Iowa Medicaid wants to hear from you, our ask:
  - Review the procedure codes and descriptions.
  - Provide feedback on individual codes per the chat box today or email:  
[ime\\_telehealth@dhs.state.ia.us](mailto:ime_telehealth@dhs.state.ia.us)

# SITE OF SERVICE DIFFERENTIAL

- Prior to the public health emergency, the Department of Health and Human Services was required to adjust the Iowa Medicaid reimbursement rates for physician services, by applying a site of service (SoS) differential to reflect the difference between the cost of services when provided in a health care facility setting and the cost of services when provided in an office setting.
- For more information see [Information Letter \(IL\) 1815](#).

# SITE OF SERVICE DIFFERENTIAL

- Iowa Administrative Code {IAC 441-78.55(249A)} Services Rendered Via Telehealth; states “healthcare services provided through in-person consultations or through Telehealth shall be treated as equivalent services for the purposes of reimbursement.”
- Iowa Medicaid interprets this as treating face-to-face and Telehealth services the same when considering reimbursement.
- Therefore, if the service is provided in a facility setting, the payment is subject to a site of service differential (SoS) whether the services were provided via Telehealth or face to face.
- The Department is considering the reinstatement of the SoS differential post public health emergency as reflected in IAC.



# SITE OF SERVICE DIFFERENTIAL

- Iowa Medicaid researched many different state approaches to Telehealth post public health emergency and found that there are varying state approaches with regards to the SoS.
- The Centers for Medicare and Medicaid (CMS) guidelines have not changed regarding the SoS differential for the inclusion of Telehealth (POS 02 and 10), which supports Iowa Medicaid's reinstatement of the SoS differential post public health emergency.
- Iowa Medicaid wants to hear from you regarding SoS:
  - [ime\\_telehealth@dhs.state.ia.us](mailto:ime_telehealth@dhs.state.ia.us).

# Other Issues

- Telephone Only Telehealth:

- Iowa Medicaid intends to follow Medicare guidelines to establish codes allowed to be delivered via telephone-only Telehealth post-public health emergency. CMS is still establishing billing guidelines and finalizing these codes.

- Distance Sites:

- Medicare does not define a distance site but prohibits service delivery from a provider physically located outside of the United States. Iowa Medicaid is still working on guidance for any distance site limitations for providers.

- Originating Sites:

- Iowa Medicaid intends to continue to allow patients to access Telehealth services in their homes.

# Resources

- Several Informational Letters have been provided regarding Telehealth:  
<https://secureapp.dhs.state.ia.us/IMPA/Information/Bulletins.aspx>
- Provider Frequently Asked Questions regarding Telehealth has been posted page on the Iowa Medicaid Telehealth website:  
<https://dhs.iowa.gov/ime/providers/faqs/covid19/telehealth>
- DRAFT documents from today's townhall:
  - [https://dhs.iowa.gov/sites/default/files/Telehealth\\_Issues\\_and\\_Decisions.pdf?110720221444](https://dhs.iowa.gov/sites/default/files/Telehealth_Issues_and_Decisions.pdf?110720221444)
  - [https://dhs.iowa.gov/sites/default/files/Telehealth\\_Recommendation\\_Coverage.pdf?110720221445](https://dhs.iowa.gov/sites/default/files/Telehealth_Recommendation_Coverage.pdf?110720221445)
  - [https://dhs.iowa.gov/sites/default/files/Telehealth\\_Recommendation\\_Noncoverage.pdf?110720221445](https://dhs.iowa.gov/sites/default/files/Telehealth_Recommendation_Noncoverage.pdf?110720221445)

# Questions